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April 13, 2001

Ex Parte Presentation

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

APR 13 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

*Re: Application by Southwestern Bell for Provision of In-Region,
InterLATA Services in Missouri, CC Docket No. 01-88*

Dear Ms. Salas:

On behalf of SBC Communications Inc. ("SBC"), I am writing to correct a performance-measurement ("PM") reporting error that has recently been brought to our attention by attorneys at the Department of Justice. The data reported for PMs 69-04 through 69-07, as reflected on a single page in Attachment B to the Affidavit of William R. Dysart, erroneously included Texas data rather than Missouri data for Southwestern Bell Telephone Company ("SWBT"). Because a new SWBT employee made an error in operating the program, Texas data was accidentally included in the charts. The error only affected the SWBT data – in other words, the data included in the attachment for these PMs accurately reflect SWBT's performance for CLECs in Missouri – and the Hit or Miss Report, which is Attachment A to the Dysart Affidavit, correctly included Missouri data for both CLECs and SWBT. Moreover, the data as posted to SBC's web site also accurately included Missouri data for all parties. The corrected results do not change the fact that SWBT has been in parity for all of these measures over the past 12 months.

I am attaching the page from Attachment B to the Dysart Affidavit that now correctly reflects the Missouri data for PMs 69-04 through 69-07 and page 58 from the Dysart Affidavit itself, which reflects a corresponding correction in paragraph 128.

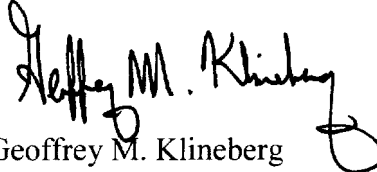
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Magalie Roman Salas
April 13, 2001
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Ex Parte Presentation

Pursuant to the Commission's rules governing ex parte communications, I am enclosing two copies of this letter and attachments. Please file stamp and return the additional copy. Thank you for your kind assistance in this matter.

Sincerely,

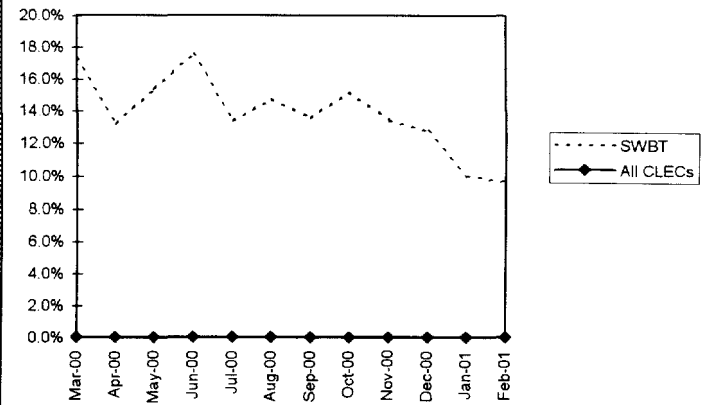

Geoffrey M. Klineberg

Attachments

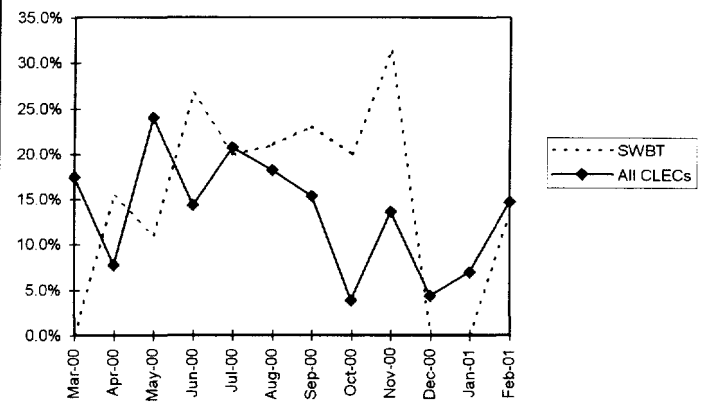
cc: Tom Navin
Gary Remondino
Layla Seirafi
Dan Joyce
ITS

Repeat Reports (%)

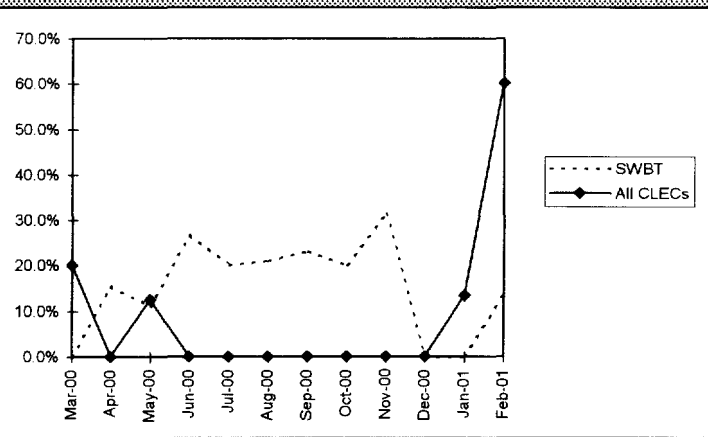
Measurement 69 - 04	ISDN BRI Port				
	All CLECs			SWBT	Z-Value
	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Mar-00	0	0	n/a	17.3%	n/a
Apr-00	0	0	n/a	13.2%	n/a
May-00	0	0	n/a	15.4%	n/a
Jun-00	0	0	n/a	17.6%	n/a
Jul-00	0	0	n/a	13.4%	n/a
Aug-00	0	0	n/a	14.8%	n/a
Sep-00	0	0	n/a	13.6%	n/a
Oct-00	0	0	n/a	15.2%	n/a
Nov-00	0	0	n/a	13.5%	n/a
Dec-00	0	0	n/a	12.8%	n/a
Jan-01	0	0	n/a	10.1%	n/a
Feb-01	0	0	n/a	9.7%	n/a
12 Mo. Total	0	0	n/a	14.2%	



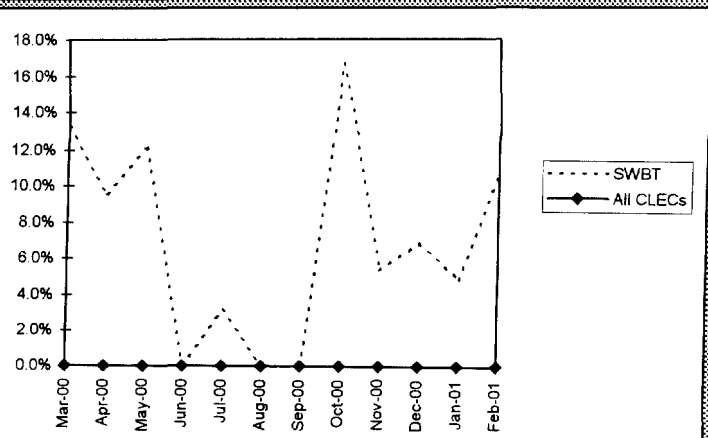
Measurement 69 - 05	DS1 Loop With Test Access				
	All CLECs			SWBT	Z-Value
	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Mar-00	23	4	17.4%	0.0%	1.26
Apr-00	26	2	7.7%	15.4%	-0.75
May-00	25	6	24.0%	11.1%	1.07
Jun-00	42	6	14.3%	26.7%	-1.08
Jul-00	29	6	20.7%	20.0%	0.05
Aug-00	33	6	18.2%	21.1%	-0.25
Sep-00	39	6	15.4%	23.1%	-0.63
Oct-00	26	1	3.8%	20.0%	-1.74
Nov-00	22	3	13.6%	31.3%	-1.31
Dec-00	23	1	4.3%	0.0%	0.60
Jan-01	43	3	7.0%	0.0%	0.82
Feb-01	41	6	14.6%	13.3%	0.12
12 Mo. Total	372	50	13.4%	17.1%	



Measurement 69 - 06	DS1 Dedicated Transport				
	All CLECs			SWBT	Z-Value
	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Mar-00	5	1	20.0%	0.0%	1.32
Apr-00	2	0	0.0%	15.4%	-0.60
May-00	8	1	12.5%	11.1%	0.10
Jun-00	2	0	0.0%	26.7%	-0.84
Jul-00	8	0	0.0%	20.0%	-1.34
Aug-00	5	0	0.0%	21.1%	-1.12
Sep-00	8	0	0.0%	23.1%	-1.47
Oct-00	2	0	0.0%	20.0%	-0.70
Nov-00	3	0	0.0%	31.3%	-1.13
Dec-00	2	0	0.0%	0.0%	0.00
Jan-01	15	2	13.3%	0.0%	1.14
Feb-01	5	3	60.0%	13.3%	2.09
12 Mo. Total	65	7	10.8%	17.1%	



Measurement 69 - 07	ISDN - PRI				
	All CLECs			SWBT	Z-Value
	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Mar-00	0	0	n/a	13.2%	n/a
Apr-00	0	0	n/a	9.5%	n/a
May-00	0	0	n/a	12.1%	n/a
Jun-00	0	0	n/a	0.0%	n/a
Jul-00	0	0	n/a	3.1%	n/a
Aug-00	0	0	n/a	0.0%	n/a
Sep-00	0	0	n/a	0.0%	n/a
Oct-00	0	0	n/a	16.7%	n/a
Nov-00	0	0	n/a	5.4%	n/a
Dec-00	0	0	n/a	6.9%	n/a
Jan-01	0	0	n/a	4.9%	n/a
Feb-01	0	0	n/a	10.6%	n/a
12 Mo. Total	0	0	n/a	7.7%	



127. Performance results for PM 65-06 (Trouble Report Rate – DS1 Dedicated Transport) show that SWBT has provided parity service during each of the last twelve months. Missouri CLECs' DS1 dedicated transport circuits generated an average monthly trouble report rate of 2.4%, lower than SWBT's 3.8% retail DS1 trouble report rate. Likewise, the data for PM 59-06 (Percent Trouble Reports Within 30 Days of Installation – N, T, C Orders – DS1 Dedicated Transport) demonstrate that SWBT has achieved parity in each of the five months in which there were sufficient CLEC data, and that over the twelve-month period as a whole, the trouble report rate for CLECs was only marginally higher than that of SWBT's retail operations (7.1% vs. 6.5%).

128. Finally, data for PM 69-06 (Percent Repeat Trouble Reports – DS1 Dedicated Transport) indicate that only one individual month offered data sufficient to draw a meaningful conclusion. During January 2001, SWBT provided parity service to the CLECs. Nonetheless, during the March 2000 – February 2001 period as a whole, CLECs experienced a repeat report rate of 10.8%, ~~roughly half the 19.5%~~ **less than the 17.1%** repeat report rate experienced by SWBT's retail operations. Thus, the data strongly indicate that SWBT provides Missouri CLECs nondiscriminatory access to DS1 local transport installation and maintenance services.

DS3 Dedicated Transport

129. Although the number of DS3 dedicated transport circuits installed for Missouri CLECs over the past twelve months is insufficient to support reliable statistical test results for parity, the data for PM 58-13 (Percent SWBT-Caused Missed Due Dates – DS3 Dedicated Transport) indicate that only nine of the 77 circuits was affected by a missed due date since March 2000. In addition, the data for PM 62-13 (Average Delay Days for SWBT Missed Due